

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13
:
ROSE A. HARBAUGH, : No. 25-00790-HWV
Debtor :
:

ENTRY OF APPEARANCE AND REQUEST
FOR SERVICE OF PAPERS, RECEIPT OF
NOTICES, AND INCLUSION ON NOTICE LIST

TO THE CLERK OF THE BANKRUPTCY COURT:

PLEASE TAKE NOTICE that the undersigned law firm is counsel for a party in interest in the above-captioned case, and, pursuant to Bankruptcy Rules 2002 and 9007, our client respectfully requests that all notices given or required to be given in this case and in any adversary proceedings by the Court, the Debtors, any Creditors' Committee, any Trustee, the United States Trustee, any Trustee subsequently appointed, and/or any other party in interest in this case be given to our client and the undersigned counsel at the addresses and to the persons, telephone numbers and telecopier set forth below. This request includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statement of affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, delivery service, telephone, telegraph, telex, telecopier, or otherwise:

Fulton Bank, N.A.
One Penn Square
P.O. Box 4887
Lancaster, PA 17604

Attorney and Address
Matthew G. Brushwood, Esquire
Barley Snyder, LLP
2755 Century Blvd.
Wyomissing, PA 19610
Telephone No: (610) 372-3500
Email Address: mbrushwood@barley.com

PLEASE TAKE FURTHER NOTICE that client intends that neither this notice of appearance nor any later appearance, pleading, claim or suit shall waive (i) client's rights to have orders in non-core matters entered only after de novo review by a District Judge, (ii) client's right to trial by jury in any proceeding so triable in this case or any other cases, controversies or proceedings related to this case, (iii) client's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) client's right to have the Bankruptcy Court and the District Court abstain in any matter subject to mandatory or discretionary abstention or (v) any other rights, claims, actions, defenses, set-offs or recoupments to which client is or may be entitled under agreements or in law or in equity, all of which rights, claims, actions, defenses, set-offs and recoupments client expressly reserves.

DATED: May 20, 2025

By: /s/ Matthew G. Brushwood, Esquire
Matthew G. Brushwood, Esquire
Barley Snyder LLP
PA Attorney I.D. No. 310592
2755 Century Blvd.
Wyomissing, PA 19610
(610) 898-7165

I hereby certify that copies of this Entry of Appearance were served May 20, 2025 by ECF notice (electronically) upon:

Trustee
Jack N. Zaharopoulos, Esquire
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Debtor's Attorney
Matthew Lazarus, Esquire
Lazarus Law, LLC
2173 Embassy Drive, Unit 538
Lancaster, PA 17603

U.S. Trustee
Office of United States Trustee
1501 N. 6th St.
Harrisburg, PA 17102

We hereby certify that copies of this Entry of Appearance were served by U.S. First Class Mail, postage prepaid, upon the following entities on the date hereof:

Debtor

Rose A. Harbaugh
18 6th Ave.
Lebanon, PA 17042